

EXHIBIT B

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF TA-NEHISI COATES'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

REQUEST FOR PRODUCTION NO. 31:

All of YOUR non-privileged COMMUNICATIONS with any THIRD-PARTY CONCERNING META LANGUAGE MODELS from March 1, 2024 through August 20, 2024.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All . . . Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, and 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive documents.

REQUEST FOR PRODUCTION NO. 32:

DOCUMENTS sufficient to show any projection of sales (by dollar amount and volume) prepared or received by YOU, relating to YOUR ASSERTED WORKS from prior to the first publication of YOUR ASSERTED WORKS through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to

REQUEST FOR PRODUCTION NO. 36:

Produce all COMMUNICATIONS on any email or social media account YOU identified in response to Interrogatory No. 14 that discuss or relate to Meta, the Action, YOUR claims in the Action, YOUR use of any generative AI product or service, or any license of YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the Request as overbroad because it calls for production of “all Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request as irrelevant and not proportional to the needs of the case. Plaintiff objects to this Request as the burden and expense outweigh any likely benefit. Plaintiff also hereby incorporates by reference Plaintiff’s objections to Interrogatory No 14.

Subject to and without waiving the general and specific objections stated above, Plaintiff is willing to meet and confer with Meta regarding the scope of this request.

REQUEST FOR PRODUCTION NO. 37:

Produce DOCUMENTS sufficient to IDENTIFY each alleged market that YOU identified in response to Interrogatory No 16.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request because it prematurely seeks information that is the subject of expert testimony. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Holden Benon (State Bar No. 325847)
Aaron Cera (State Bar No. 351163)
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF JUNOT DIAZ'S RESPONSES
AND OBJECTIONS TO DEFENDANT
META PLATFORMS, INC.'S SECOND SET
OF REQUESTS FOR PRODUCTION OF
DOCUMENTS AND THINGS**

REQUEST FOR PRODUCTION NO. 31:

All of YOUR non-privileged COMMUNICATIONS with any THIRD-PARTY CONCERNING META LANGUAGE MODELS from March 1, 2024 through August 20, 2024.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All . . . Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to Plaintiff Junot Diaz. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, and 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive documents.

REQUEST FOR PRODUCTION NO. 32:

DOCUMENTS sufficient to show any projection of sales (by dollar amount and volume) prepared or received by YOU, relating to YOUR ASSERTED WORKS from prior to the first publication of YOUR ASSERTED WORKS through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to

REQUEST FOR PRODUCTION NO. 36:

Produce all COMMUNICATIONS on any email or social media account YOU identified in response to Interrogatory No. 14 that discuss or relate to Meta, the Action, YOUR claims in the Action, YOUR use of any generative AI product or service, or any license of YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the Request as overbroad because it calls for production of “all Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request as irrelevant and not proportional to the needs of the case. Plaintiff objects to this Request as the burden and expense outweigh any likely benefit. Plaintiff also hereby incorporates by reference Plaintiff’s objections to Interrogatory No 14.

Subject to and without waiving the general and specific objections stated above, Plaintiff is willing to meet and confer with Meta regarding the scope of this request.

REQUEST FOR PRODUCTION NO. 37:

Produce DOCUMENTS sufficient to IDENTIFY each alleged market that YOU identified in response to Interrogatory No 16.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request because it prematurely seeks information that is the subject of expert testimony. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,

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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF CHRISTOPHER GOLDEN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

REQUEST FOR PRODUCTION NO. 31:

All of YOUR non-privileged COMMUNICATIONS with any THIRD-PARTY CONCERNING META LANGUAGE MODELS from March 1, 2024 through August 20, 2024.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All . . . Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, and 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive documents.

REQUEST FOR PRODUCTION NO. 32:

DOCUMENTS sufficient to show any projection of sales (by dollar amount and volume) prepared or received by YOU, relating to YOUR ASSERTED WORKS from prior to the first publication of YOUR ASSERTED WORKS through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to

REQUEST FOR PRODUCTION NO. 36:

Produce all COMMUNICATIONS on any email or social media account YOU identified in response to Interrogatory No. 14 that discuss or relate to Meta, the Action, YOUR claims in the Action, YOUR use of any generative AI product or service, or any license of YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the Request as overbroad because it calls for production of “all Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request as irrelevant and not proportional to the needs of the case. Plaintiff objects to this Request as the burden and expense outweigh any likely benefit. Plaintiff also hereby incorporates by reference Plaintiff’s objections to Interrogatory No 14.

Subject to and without waiving the general and specific objections stated above, Plaintiff is willing to meet and confer with Meta regarding the scope of this request.

REQUEST FOR PRODUCTION NO. 37:

Produce DOCUMENTS sufficient to IDENTIFY each alleged market that YOU identified in response to Interrogatory No 16.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request because it prematurely seeks information that is the subject of expert testimony. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Holden Benon (State Bar No. 325847)
Aaron Cera (State Bar No. 351163)
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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF ANDREW SEAN GREER'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

REQUEST FOR PRODUCTION NO. 31:

All of YOUR non-privileged COMMUNICATIONS with any THIRD-PARTY CONCERNING META LANGUAGE MODELS from March 1, 2024 through August 20, 2024.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All . . . Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, and 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive documents.

REQUEST FOR PRODUCTION NO. 32:

DOCUMENTS sufficient to show any projection of sales (by dollar amount and volume) prepared or received by YOU, relating to YOUR ASSERTED WORKS from prior to the first publication of YOUR ASSERTED WORKS through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to

REQUEST FOR PRODUCTION NO. 36:

Produce all COMMUNICATIONS on any email or social media account YOU identified in response to Interrogatory No. 14 that discuss or relate to Meta, the Action, YOUR claims in the Action, YOUR use of any generative AI product or service, or any license of YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the Request as overbroad because it calls for production of “all Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request as irrelevant and not proportional to the needs of the case. Plaintiff objects to this Request as the burden and expense outweigh any likely benefit. Plaintiff also hereby incorporates by reference Plaintiff’s objections to Interrogatory No 14.

Subject to and without waiving the general and specific objections stated above, Plaintiff is willing to meet and confer with Meta regarding the scope of this request.

REQUEST FOR PRODUCTION NO. 37:

Produce DOCUMENTS sufficient to IDENTIFY each alleged market that YOU identified in response to Interrogatory No 16.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request because it prematurely seeks information that is the subject of expert testimony. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,

Joseph R. Saveri (State Bar No. 130064)
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Holden Benon (State Bar No. 325847)
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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF DAVID HENRY HWANG'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

REQUEST FOR PRODUCTION NO. 31:

All of YOUR non-privileged COMMUNICATIONS with any THIRD-PARTY CONCERNING META LANGUAGE MODELS from March 1, 2024 through August 20, 2024.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All . . . Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, and 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive documents.

REQUEST FOR PRODUCTION NO. 32:

DOCUMENTS sufficient to show any projection of sales (by dollar amount and volume) prepared or received by YOU, relating to YOUR ASSERTED WORKS from prior to the first publication of YOUR ASSERTED WORKS through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to

REQUEST FOR PRODUCTION NO. 36:

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RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the Request as overbroad because it calls for production of “all Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request as irrelevant and not proportional to the needs of the case. Plaintiff objects to this Request as the burden and expense outweigh any likely benefit. Plaintiff also hereby incorporates by reference Plaintiff’s objections to Interrogatory No 14.

Subject to and without waiving the general and specific objections stated above, Plaintiff is willing to meet and confer with Meta regarding the scope of this request.

REQUEST FOR PRODUCTION NO. 37:

Produce DOCUMENTS sufficient to IDENTIFY each alleged market that YOU identified in response to Interrogatory No 16.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request because it prematurely seeks information that is the subject of expert testimony. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,

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Holden Benon (State Bar No. 325847)
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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

Related Case No. 4:23-cv-06663

**PLAINTIFF RICHARD KADREY'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

1 **REQUEST FOR PRODUCTION NO. 31:**

2 All of YOUR non-privileged COMMUNICATIONS with any THIRD-PARTY
3 CONCERNING META LANGUAGE MODELS from March 1, 2024 through August 20, 2024.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

5 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
6 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
7 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
8 of the case, particularly because the Request seeks “All . . . Communications.” Plaintiff objects to the
9 defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant
10 and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired,
11 retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to
12 Plaintiff Richard Kadrey. Plaintiff objects to this Request to the extent that it is duplicative, in whole or
13 in part, of Request for Production Nos. 2, 3, and 4.

14 Subject to and without waiving the general and specific objections stated above, Plaintiff will
15 search for and produce relevant and responsive documents.

16 **REQUEST FOR PRODUCTION NO. 32:**

17 DOCUMENTS sufficient to show any projection of sales (by dollar amount and volume)
18 prepared or received by YOU, relating to YOUR ASSERTED WORKS from prior to the first
19 publication of YOUR ASSERTED WORKS through the present.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

21 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
22 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
23 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
24 of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the
25 defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant
26 and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired,
27 retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to

REQUEST FOR PRODUCTION NO. 36:

Produce all COMMUNICATIONS on any email or social media account YOU identified in response to Interrogatory No. 14 that discuss or relate to Meta, the Action, YOUR claims in the Action, YOUR use of any generative AI product or service, or any license of YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the Request as overbroad because it calls for production of “all Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request as irrelevant and not proportional to the needs of the case. Plaintiff objects to this Request as the burden and expense outweigh any likely benefit. Plaintiff also hereby incorporates by reference Plaintiff’s objections to Interrogatory No 14.

Subject to and without waiving the general and specific objections stated above, Plaintiff is willing to meet and confer with Meta regarding the scope of this request.

REQUEST FOR PRODUCTION NO. 37:

Produce DOCUMENTS sufficient to IDENTIFY each alleged market that YOU identified in response to Interrogatory No 16.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request because it prematurely seeks information that is the subject of expert testimony. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Holden Benon (State Bar No. 325847)
Aaron Cera (State Bar No. 351163)
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Bryan L. Clobes (pro hac vice)
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mrathur@caffertyclobes.com

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF MATTHEW KLAM'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

REQUEST FOR PRODUCTION NO. 31:

All of YOUR non-privileged COMMUNICATIONS with any THIRD-PARTY CONCERNING META LANGUAGE MODELS from March 1, 2024 through August 20, 2024.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All . . . Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to Plaintiff Matthew Klam. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, and 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive documents.

REQUEST FOR PRODUCTION NO. 32:

DOCUMENTS sufficient to show any projection of sales (by dollar amount and volume) prepared or received by YOU, relating to YOUR ASSERTED WORKS from prior to the first publication of YOUR ASSERTED WORKS through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to

REQUEST FOR PRODUCTION NO. 36:

Produce all COMMUNICATIONS on any email or social media account YOU identified in response to Interrogatory No. 14 that discuss or relate to Meta, the Action, YOUR claims in the Action, YOUR use of any generative AI product or service, or any license of YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the Request as overbroad because it calls for production of “all Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request as irrelevant and not proportional to the needs of the case. Plaintiff objects to this Request as the burden and expense outweigh any likely benefit. Plaintiff also hereby incorporates by reference Plaintiff’s objections to Interrogatory No 14.

Subject to and without waiving the general and specific objections stated above, Plaintiff is willing to meet and confer with Meta regarding the scope of this request.

REQUEST FOR PRODUCTION NO. 37:

Produce DOCUMENTS sufficient to IDENTIFY each alleged market that YOU identified in response to Interrogatory No 16.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request because it prematurely seeks information that is the subject of expert testimony. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Holden Benon (State Bar No. 325847)
Aaron Cera (State Bar No. 351163)
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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

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Bryan L. Clobes (pro hac vice)
Alexander J. Sweatman (pro hac vice)
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mrathur@caffertyclobes.com

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF LAURA LIPPMAN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

REQUEST FOR PRODUCTION NO. 31:

All of YOUR non-privileged COMMUNICATIONS with any THIRD-PARTY CONCERNING META LANGUAGE MODELS from March 1, 2024 through August 20, 2024.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All . . . Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to Plaintiff Laura Lippman. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, and 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive documents.

REQUEST FOR PRODUCTION NO. 32:

DOCUMENTS sufficient to show any projection of sales (by dollar amount and volume) prepared or received by YOU, relating to YOUR ASSERTED WORKS from prior to the first publication of YOUR ASSERTED WORKS through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to

REQUEST FOR PRODUCTION NO. 36:

Produce all COMMUNICATIONS on any email or social media account YOU identified in response to Interrogatory No. 14 that discuss or relate to Meta, the Action, YOUR claims in the Action, YOUR use of any generative AI product or service, or any license of YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the Request as overbroad because it calls for production of “all Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request as irrelevant and not proportional to the needs of the case. Plaintiff objects to this Request as the burden and expense outweigh any likely benefit. Plaintiff also hereby incorporates by reference Plaintiff’s objections to Interrogatory No 14.

Subject to and without waiving the general and specific objections stated above, Plaintiff is willing to meet and confer with Meta regarding the scope of this request.

REQUEST FOR PRODUCTION NO. 37:

Produce DOCUMENTS sufficient to IDENTIFY each alleged market that YOU identified in response to Interrogatory No 16.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request because it prematurely seeks information that is the subject of expert testimony. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Holden Benon (State Bar No. 325847)
Aaron Cera (State Bar No. 351163)
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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF SARAH SILVERMAN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

1 **REQUEST FOR PRODUCTION NO. 31:**

2 All of YOUR non-privileged COMMUNICATIONS with any THIRD-PARTY
3 CONCERNING META LANGUAGE MODELS from March 1, 2024 through August 20, 2024.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

5 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
6 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
7 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
8 of the case, particularly because the Request seeks “All . . . Communications.” Plaintiff objects to the
9 defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant
10 and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired,
11 retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to
12 Plaintiff Sarah Silverman. Plaintiff objects to this Request to the extent that it is duplicative, in whole or
13 in part, of Request for Production Nos. 2, 3, and 4.

14 Subject to and without waiving the general and specific objections stated above, Plaintiff will
15 search for and produce relevant and responsive documents.

16 **REQUEST FOR PRODUCTION NO. 32:**

17 DOCUMENTS sufficient to show any projection of sales (by dollar amount and volume)
18 prepared or received by YOU, relating to YOUR ASSERTED WORKS from prior to the first
19 publication of YOUR ASSERTED WORKS through the present.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

21 In addition to and without waiving the general objections set forth above, Plaintiff objects to this
22 Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
23 Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs
24 of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the
25 defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant
26 and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired,
27 retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to

REQUEST FOR PRODUCTION NO. 36:

Produce all COMMUNICATIONS on any email or social media account YOU identified in response to Interrogatory No. 14 that discuss or relate to Meta, the Action, YOUR claims in the Action, YOUR use of any generative AI product or service, or any license of YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the Request as overbroad because it calls for production of “all Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request as irrelevant and not proportional to the needs of the case. Plaintiff objects to this Request as the burden and expense outweigh any likely benefit. Plaintiff also hereby incorporates by reference Plaintiff’s objections to Interrogatory No 14.

Subject to and without waiving the general and specific objections stated above, Plaintiff is willing to meet and confer with Meta regarding the scope of this request.

REQUEST FOR PRODUCTION NO. 37:

Produce DOCUMENTS sufficient to IDENTIFY each alleged market that YOU identified in response to Interrogatory No 16.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request because it prematurely seeks information that is the subject of expert testimony. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Holden Benon (State Bar No. 325847)
Aaron Cera (State Bar No. 351163)
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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

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mrathur@caffertyclobes.com

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF RACHEL LOUISE SNYDER'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

REQUEST FOR PRODUCTION NO. 31:

All of YOUR non-privileged COMMUNICATIONS with any THIRD-PARTY CONCERNING META LANGUAGE MODELS from March 1, 2024 through August 20, 2024.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All . . . Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, and 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive documents.

REQUEST FOR PRODUCTION NO. 32:

DOCUMENTS sufficient to show any projection of sales (by dollar amount and volume) prepared or received by YOU, relating to YOUR ASSERTED WORKS from prior to the first publication of YOUR ASSERTED WORKS through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to

REQUEST FOR PRODUCTION NO. 36:

Produce all COMMUNICATIONS on any email or social media account YOU identified in response to Interrogatory No. 14 that discuss or relate to Meta, the Action, YOUR claims in the Action, YOUR use of any generative AI product or service, or any license of YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the Request as overbroad because it calls for production of “all Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request as irrelevant and not proportional to the needs of the case. Plaintiff objects to this Request as the burden and expense outweigh any likely benefit. Plaintiff also hereby incorporates by reference Plaintiff’s objections to Interrogatory No 14.

Subject to and without waiving the general and specific objections stated above, Plaintiff is willing to meet and confer with Meta regarding the scope of this request.

REQUEST FOR PRODUCTION NO. 37:

Produce DOCUMENTS sufficient to IDENTIFY each alleged market that YOU identified in response to Interrogatory No 16.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request because it prematurely seeks information that is the subject of expert testimony. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,

David A. Straite (admitted *pro hac vice*)

DICELLO LEVITT LLP

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

RICHARD KADREY, SARAH SILVERMAN,
CHRISTOPHER GOLDEN, TA-NEHISI
COATES, JUNOT DÍAZ, ANDREW SEAN
GREER, DAVID HENRY HWANG,
MATTHEW KLAM, LAURA LIPPMAN,
RACHEL LOUISE SNYDER, JACQUELINE
WOODSON, AND LYSA TERKEURST,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.;

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFF LYSA TERKEURST'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S SECOND SET OF REQUESTS
FOR PRODUCTION**

PROPOUNDING PARTY: Defendant Meta Platforms, Inc.

RESPONDING PARTY: Lysa TerKeurst

SET NUMBER: Two (2)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Lysa TerKeurst ("Plaintiff") in the above-titled action hereby responds to Defendant Meta Platforms, Inc. ("Defendant" or "Meta") Requests for Production of Documents, Set Two (the "Requests"). An agreement by Plaintiff to search for documents does not mean that she has documents in her possession, custody, or control.

1 Subject to and without waiving the general and specific objections stated above, Plaintiff
2 will search for and produce relevant and responsive non-privileged documents within her
3 possession, custody, or control.

4 **REQUEST FOR PRODUCTION NO. 31:**

5 All of YOUR non-privileged COMMUNICATIONS with any THIRD-PARTY
6 CONCERNING META LANGUAGE MODELS from March 1, 2024 through August 20, 2024.

7 **RESPONSE TO REQUEST NO. 31:**

8 In addition to and without waiving the general objections set forth above, Plaintiff objects
9 to this Request to the extent that it is overbroad in nature and unduly burdensome, not relevant to
10 any claim or defense, and disproportionate to the needs of the case, particularly because the
11 Request seeks “All . . . COMMUNICATIONS.” Plaintiff further objects to this Request to the
12 extent that it calls for communications subject to the attorney-client privilege, work product
13 doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to
14 this Request to the extent that it is duplicative, in whole or in part, of Request for Production No.
15 2.

16 Subject to and without waiving the general and specific objections stated above, Plaintiff
17 will search for and produce relevant and responsive non-privileged communications within her
18 possession, custody, or control.

19 **REQUEST FOR PRODUCTION NO. 32:**

20 DOCUMENTS sufficient to show any projection of sales (by dollar amount and volume)
21 prepared or received by YOU, relating to YOUR ASSERTED WORKS from prior to the first
22 publication of YOUR ASSERTED WORKS through the present.

23 **RESPONSE TO REQUEST NO. 32:**

24 In addition to and without waiving the general objections set forth above, Plaintiff objects
25 to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff
26 objects to this Request to the extent that the term “projection of sales (by dollar amount and
27

1 In addition to and without waiving the general objections set forth above, Plaintiff objects
2 to this Request to the extent that it is vague, ambiguous, and overbroad in nature in that it seeks
3 “all Documents.” Plaintiff further objects to this Request as unduly burdensome, not relevant to
4 any claim or defense, and disproportionate to the needs of the case, particularly because the
5 Request is unlimited in temporal scope. Plaintiff objects to this Request to the extent that it calls
6 for documents subject to the attorney-client privilege, work product doctrine, and/or any other
7 applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent
8 that it is duplicative, in whole or in part, of Requests for Production Nos. 8 and 15. Plaintiff also
9 hereby incorporates by reference Plaintiff’s objections to Interrogatory No 13.

10 Subject to and without waiving the general and specific objections stated above, Plaintiff
11 will search for and produce relevant and responsive non-privileged documents within her
12 possession, custody, or control.

13 **REQUEST FOR PRODUCTION NO. 36:**

14 Produce all COMMUNICATIONS on any email or social media account YOU identified
15 in response to Interrogatory No. 14 that discuss or relate to Meta, the Action, YOUR claims in
16 the Action, YOUR use of any generative AI product or service, or any license of YOUR
17 ASSERTED WORKS.

18 **RESPONSE TO REQUEST NO. 36:**

19 In addition to and without waiving the general objections set forth above, Plaintiff objects
20 to this Request to the extent that it is overbroad in nature and unduly burdensome, not relevant to
21 any claim or defense, and disproportionate to the needs of the case, particularly because the
22 Request seeks “all COMMUNICATIONS.” Plaintiff further objects to this Request as overbroad
23 in nature and unduly burdensome, not relevant to any claim or defense, and disproportionate to
24 the needs of the case, to the extent it seeks all “COMMUNICATIONS” related to Meta in any
25 way, regardless of whether they pertain to this Action. Plaintiff further objects to this Request to
26 the extent that it calls for communications subject to the attorney-client privilege, work product

1 doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff further
2 objects to this Request on the grounds that some of the requested communications are publicly
3 accessible, are equally available to Defendant, or are already in the possession, custody, or
4 control of Defendant. Plaintiff objects to this Request to the extent that it is duplicative, in whole
5 or in part, of Request for Production No. 2, 13 and 14. Plaintiff also hereby incorporates by
6 reference Plaintiff's objections to Interrogatory No 14.

7 Subject to and without waiving the general and specific objections stated above, Plaintiff
8 will search for and produce relevant and responsive non-privileged communications within her
9 possession, custody, or control relating to this ACTION, Meta's AI products or services, and/or
10 the license of Plaintiff's asserted works, that are not equally accessible to the Defendant in this
11 ACTION.

12 **REQUEST FOR PRODUCTION NO. 37:**

13 Produce DOCUMENTS sufficient to IDENTIFY each alleged market that YOU
14 identified in response to Interrogatory No 16.

15 **RESPONSE TO REQUEST NO. 37:**

16 In addition to and without waiving the general objections set forth above, Plaintiff objects
17 to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff further
18 objects to this Request as unduly burdensome, not relevant to any claim or defense, and
19 disproportionate to the needs of the case, particularly because the Request is unlimited in
20 temporal scope. Plaintiff objects to this Request because it prematurely seeks information that is
21 the subject of expert testimony. Plaintiff objects to this Request to the extent that it calls for
22 documents subject to the attorney-client privilege, work product doctrine, and/or any other
23 applicable privilege or protection from disclosure. Plaintiff objects to this Request to the extent
24 that it is duplicative, in whole or in part, of Requests for Production Nos. 8 and 15. Plaintiff also
25 hereby incorporates by reference Plaintiff's objections to Interrogatory No 16.

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF JACQUELINE WOODSON'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
THINGS**

REQUEST FOR PRODUCTION NO. 31:

All of YOUR non-privileged COMMUNICATIONS with any THIRD-PARTY CONCERNING META LANGUAGE MODELS from March 1, 2024 through August 20, 2024.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the Request seeks “All . . . Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff objects to this Request to the extent that it is duplicative, in whole or in part, of Request for Production Nos. 2, 3, and 4.

Subject to and without waiving the general and specific objections stated above, Plaintiff will search for and produce relevant and responsive documents.

REQUEST FOR PRODUCTION NO. 32:

DOCUMENTS sufficient to show any projection of sales (by dollar amount and volume) prepared or received by YOU, relating to YOUR ASSERTED WORKS from prior to the first publication of YOUR ASSERTED WORKS through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe “You” and “Your” as referring to

REQUEST FOR PRODUCTION NO. 36:

Produce all COMMUNICATIONS on any email or social media account YOU identified in response to Interrogatory No. 14 that discuss or relate to Meta, the Action, YOUR claims in the Action, YOUR use of any generative AI product or service, or any license of YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this Request as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly in terms of the period of time set forth in the request. Plaintiff objects to the Request as overbroad because it calls for production of “all Communications.” Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure. Plaintiff objects to this Request as irrelevant and not proportional to the needs of the case. Plaintiff objects to this Request as the burden and expense outweigh any likely benefit. Plaintiff also hereby incorporates by reference Plaintiff’s objections to Interrogatory No 14.

Subject to and without waiving the general and specific objections stated above, Plaintiff is willing to meet and confer with Meta regarding the scope of this request.

REQUEST FOR PRODUCTION NO. 37:

Produce DOCUMENTS sufficient to IDENTIFY each alleged market that YOU identified in response to Interrogatory No 16.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

In addition to and without waiving the general objections set forth above, Plaintiff objects to this Request because it prematurely seeks information that is the subject of expert testimony. Plaintiff objects to this Request to the extent that it calls for documents subject to the attorney-client privilege,